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Mary A. Millner
United States Environmental Protection Agency
Region 10
Office of Compliance and Enforcement
Ground Water Unit
1200 6th Avenue, Suite 900, OCE-082
Seattle, Washington 98101

**REQUEST FOR CONSIDERATION FOR SITE CLOSURE FOR WESTERN GAS
401 SOUTH ELM STREET, TOPPENISH, WASHINGTON
(USEPA CONTRACT NO. EP-W-12-009 AND TASK ORDER B-7)**

Dear Ms. Millner:

I have been retained by the service station owner and operator, Mr. Praveen Dewan with P. R. Distributors, LLC, to review the history of the subject site and provide a recommendation for appropriate assessment and/or mitigation measures that may facilitate moving this site to closure. To perform this evaluation I reviewed Bristol Environmental Remediation Services, LLC's Site Assessment Report (SAR), dated March 2013, which presents a site history along with the results of soil and groundwater samples collected during the fourth quarter of 2012. The SAR documents that the older fueling facilities have been replaced at the site with modern facilities and that approximately 600 cubic yards of petroleum-containing soils were excavated and disposed of in association with the facility upgrade activities. During the fourth quarter 2012 investigation volatile organic compounds (VOCs) were either not detected or were detected at concentrations less than both the USEPA and Washington State Department of Ecology Model Toxics Control Act (MTCA) cleanup standards. However, total petroleum hydrocarbons as gasoline (TPHg) was detected in excess of the Washington State standards in a single soil sample (BH-1 at 18 feet at a concentration of 580 mg/kg) and in a single groundwater sample (MW-2 at 2.9 mg/L). The SAR documents that aerobic conditions exist at the site that are resulting in natural attenuation of the residual hydrocarbons at the site, and recommends that a site closure evaluation be performed in accordance with the MTCA Workbook for Calculating Cleanup Levels for Petroleum Contaminated Sites. On behalf of P.R. Distributors, LLC, I recommend that the USEPA perform the MTCA risk evaluation, and if the residual concentrations in these two samples are less than the acceptable levels, the USEPA should categorize the site as a low risk site, issue a no further action determination as to the performance of additional assessment and mitigation activities at the site, and permit the abandonment of the groundwater monitoring wells at the site. If you have any questions or require additional information, please contact me at (661) 205-7000 or at e-mail address mrmagargee@gmail.com.

Respectfully submitted,

Mark R. Magargee

Mark R. Magargee, PG, CHG
Professional Geologist
Consulting Hydrogeologist



cc: Mr. Praveen Dewan, P. R. Distributors, LLC